

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**UNITED STATES OF AMERICA**

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§

**V.**

**CRIMINAL NO. 1:22-CR-015-LY**

**RYAN BLAKE MCKINNEY**

**MOTION OF DEFENDANT RYAN BLAKE MCKINNEY  
FOR RECONSIDERATION OF DETENTION ORDER**

COMES NOW, RYAN BLAKE MCKINNEY, Defendant in the above-styled and numbered cause, and moves this Court to reconsider its Order for Detention entered on February 2, 2022, for the purpose of presenting a change of circumstances and in support thereof would show:

**I.**

Defendant RYAN BLAKE MCKINNEY is charged with Attempting to Damage or Destroy Property Used in or Affecting Interstate Commerce. Defendant was arrested on January 28, 2022 and was temporarily detained.

**II.**

After a Detention hearing on February 2, 2022, United States Magistrate Judge Mark Lane ordered the Defendant detained without bail when Defendant waived his right to conduct the hearing at that time with the right to request a hearing at a later time.

**III.**

Under 18 U.S.C. § 3142(f), a detention hearing may be reopened at any time before trial

...if the judicial officer finds that information exists that was not known to the movant at the time of the hearing and that has a material bearing on the issue whether there are conditions of release that will reasonably assure the appearance of the person as required and the safety of any other person and the community.

IV.

Factors that the Court considered which form the basis and reason for the Order of Detention are no longer present. Defendant has information to present to the Court regarding a plan for mental health treatment after consulting professionals with the cooperation of Defendant's family.

There exists a combination of conditions that would preserve the safety of the public while permitting the Defendant to be released on bond.

WHEREFORE, in consideration of the above, Defendant RYAN BLAKE MCKINNEY respectfully requests that the Magistrate reconsider its Detention Order of February 2, 2022, and grant defendant a bond with such conditions of release as this Court deems appropriate.

Respectfully submitted,

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ATTORNEY FOR RYAN BLAKE MCKINNEY

**CERTIFICATE OF SERVICE**

I hereby certify that on the 8<sup>th</sup> day of March, 2022, a true and correct copy of the above and foregoing Motion for Reconsideration of Detention Order was electronically filed with the clerk of the court, using the CM/ECF System which will transmit notification of such filing to all counsel of record:

Mr. Karthik Srinivasan  
Assistant United States Attorney  
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/s/Samuel E. Bassett

SAMUEL E. BASSETT